

**Exhibit A**

Proposed Order

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re :

Chapter 11

MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.* :

Case No. 09-50026 (MG)

Debtors. :  
-----X

(Jointly Administered)

**SHOW CAUSE ORDER ESTABLISHING FEBRUARY 26, 2020 AS THE  
DEADLINE BY WHICH: (I) THE REMAINING LATE CLAIMANTS MUST FILE A  
NOTICE OF INTENTION TO PROCEED *PRO SE* OR (II) COUNSEL TO THE  
REMAINING LATE CLAIMANTS (IF ANY) MUST FILE A NOTICE OF  
APPEARANCE IN THIS CHAPTER 11 CASE**

Upon the motion (the “Motion”)<sup>1</sup> of the GUC Trust Administrator for entry of an order (the “Show Cause Order”), pursuant to Bankruptcy Code section 105(a) and Local Bankruptcy Rule 9077-1, establishing February 26, 2020 as the deadline by which: (i) the Remaining Late Claimants must file a notice of intention to proceed *pro se* or (ii) counsel to the Remaining Late Claimants (if any) must file a notice of appearance in this Chapter 11 Case, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated February 1, 2012; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Motion and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

2. On or before February 26, 2020, the Remaining Late Claim Movants listed on **Schedule 1** to this Show Cause Order (or their counsel) shall file a notice of intention to proceed *pro se* or a notice of appearance, as applicable, in this Chapter 11 Case.
3. The GUC Trust Administrator shall serve this Show Cause Order on all of the Remaining Late Claim Movants listed on **Schedule 1** to this Show Cause Order via first class mail and email within five (5) business days of entry of this Show Cause Order.
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Show Cause Order.

Dated: \_\_\_\_\_, 2020  
New York, New York

\_\_\_\_\_  
THE HONORABLE MARTIN GLENN  
UNITED STATES BANKRUPTCY JUDGE

**Schedule 1**

Remaining Late Claim Movants

1.	Lynda Duncan
2.	Christopher Gracia (Deceased)
3.	Nicole Jaure
4.	Tammie Marshall
5.	Deidra Shipman
6.	Allen, Lisa
7.	Berard, Brandy
8.	Bueno, John
9.	Bueno, Lisa
10.	Burns, Angela
11.	Burns, Elizabeth Faye
12.	Davis, Veronica Lynn
13.	Duckett, Raymond
14.	Ferrell, Tabatha
15.	Garza, Rosy E
16.	Gibbs, Santoria
17.	Gibson, Mary
18.	Gill, April
19.	Hairston, John T
20.	Harris, Charlesa
21.	Hartnett, Carolyn individually and as representative of the Estate for Sara Hartnett
22.	Haseleu, Tanya individually and as representative of the Estate for Tiffany Lee Haseleu
23.	Haseleu, Todd individually and as representative of the Estate for Tiffany Lee Haseleu
24.	Higgins, Sherell individually and as next friend of Darrell Brown Jr. and as representative of the Estate of Dameasha Brown
25.	Honeycutt, Sammeeka
26.	Hueber, Jamie
27.	Jackman, Kenneth individually and as representative of the Estate for Jessica Jackman
28.	Jackman, Patricia individually and as representative of the Estate for Jessica Jackman
29.	Langley, Kim individually and as representative of the Estate for Richard Bailey
30.	Langley, Nick individually and as representative of the Estate for Richard Bailey
31.	Lindsay, Kenneth individually and as representative of the Estate of Rita Carol Lindsay
32.	Lockhart, Marjorie
33.	Lopez, Kimberly
34.	Maclin, Justin
35.	Moindi, Wycliffe
36.	Moza, Joell individually and as representative of the Estate for Loretta Moza
37.	Moza, Julie individually and as representative of the Estate for Loretta Moza
38.	Moza, Richard individually and as representative of the Estate for Loretta Moza

39.	Myra Washington a/k/a Minerva Peterson individually and as representative of the Estate for Myra Washington
40.	Peoples, Earlesha
41.	Peterson, Ranae
42.	Platzke, Joell
43.	Pylar, Shirley
44.	Reetz, Janet individually and as representative of the Estate for Loretta Moza
45.	Rooney, Richard
46.	Shells, Willie
47.	Snyder, Anthony
48.	Stanley, Glenn
49.	Stivers, Brandon
50.	Surbeck, Kally
51.	Torres, Aleni
52.	Torres, Daniel
53.	Vargas, Chelsea Dirks
54.	Venable, Houston
55.	Waithe, Dwayne
56.	Wallace, Carla individually and as representative of the Estate for Cory Wallace
57.	West, Linda individually and as representative of the Estate for Tracy West
58.	Willis-Singh, Tanya
59.	Wright, Jacqueline